

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x:
AURELIUS CAPITAL MASTER, LTD. and :
ACP MASTER, LTD., :
Plaintiffs, : No. 09 Civ. 8757 (TPG)
: :
- against - :
: :
THE REPUBLIC OF ARGENTINA, :
: :
Defendant. :
-----x:

AURELIUS CAPITAL MASTER, LTD. and :
ACP MASTER, LTD., :
Plaintiffs, : No. 09 Civ. 10620 (TPG)
: :
- against - :
: :
THE REPUBLIC OF ARGENTINA, :
: :
Defendant. :
-----x:

AURELIUS OPPORTUNITIES FUND II, LLC :
and AURELIUS CAPITAL MASTER, LTD., :
Plaintiffs, : No. 10 Civ. 1602 (TPG)
: :
- against - :
: :
THE REPUBLIC OF ARGENTINA, :
: :
Defendant. :
-----x:

(captions continue on following pages)

**PLAINTIFFS' NOTICE OF MOTION FOR
PARTIAL SUMMARY JUDGMENT WITH
RESPECT TO THEIR CLAIMS FOR BREACH
OF THE EQUAL TREATMENT PROVISION**

-----x:
AURELIUS OPPORTUNITIES FUND II, LLC :
and AURELIUS CAPITAL MASTER, LTD., :
Plaintiffs, : No. 10 Civ. 3507 (TPG)
- against - :
THE REPUBLIC OF ARGENTINA, :
Defendant. :
-----x:
AURELIUS CAPITAL MASTER, LTD. and :
AURELIUS OPPORTUNITIES FUND II, LLC, :
Plaintiffs, : No. 10 Civ. 3970 (TPG)
- against - :
THE REPUBLIC OF ARGENTINA, :
Defendant. :
-----x:
BLUE ANGEL CAPITAL I LLC, :
Plaintiff, : No. 10 Civ. 4101 (TPG)
- against - :
THE REPUBLIC OF ARGENTINA, :
Defendant. :
-----x:

-----x:
BLUE ANGEL CAPITAL I LLC, :
Plaintiff, : No. 10 Civ. 4782 (TPG)
: :
- against - :
: :
THE REPUBLIC OF ARGENTINA, :
: :
Defendant. :
: :
-----x:
AURELIUS CAPITAL MASTER, LTD. and :
AURELIUS OPPORTUNITIES FUND II, LLC, :
Plaintiffs, : No. 10 Civ. 8339 (TPG)
: :
- against - :
: :
THE REPUBLIC OF ARGENTINA, :
: :
Defendant. :
-----x:

PLEASE TAKE NOTICE that upon the accompanying Declaration of Daniel B. Rapport, dated October 26, 2011 (including as an exhibit the Declaration of Hal S. Scott, dated October 19, 2010, previously filed with this Court in related actions), the Declaration of Luc M. Dowling dated October 26, 2011, the Declaration of Avram Friedman dated October 26, 2011, the Statement of Material Facts, all attached exhibits, the accompanying Memorandum of Law, and all prior proceedings, Plaintiffs Aurelius Capital Master, Ltd., ACP Master, Ltd., Aurelius Opportunities Fund II, LLC and Blue Angel Capital I LLC (collectively “Plaintiffs”) will move pursuant to Rule 56 of the FED. R. CIV. P., before the Honorable Thomas P. Griesa, United States District Judge for the Southern District of New York, United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a date and time to be determined by this Court, for an Order granting Plaintiffs’ motion for partial summary judgment with respect to their claim that the Republic of Argentina has breached and is continuing to breach the Equal Treatment Provision of the Fiscal Agency Agreement, and for such other relief as the Court deems just and proper; and

NOTICE IS FURTHER GIVEN that the Republic of Argentina’s response to this Motion, if any, shall be served within fourteen (14) days after service hereof, on counsel for Plaintiffs: Edward A. Friedman, Friedman Kaplan Seiler & Adelman LLP, 7 Times Square, New York, NY 10036-6516.

Dated: October 26, 2011
New York, New York

Respectfully submitted,

FRIEDMAN KAPLAN SEILER &
ADELMAN LLP

/s/ Edward A. Friedman

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Attorneys for Plaintiffs